

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

RECEIVED

FCC MAIL ROOM

In the Matter of)
)
Amendment of the Commission's)
Rules and Policies to Increase)
Subscribership and Usage of the)
Public Switched Network)
)

CC Docket No. 95-115

DOCKET FILE COPY ORIGINAL

COMMENTS OF
ILLINOIS CONSOLIDATED TELEPHONE COMPANY

Although Illinois Consolidated Telephone Company ("ICTC") opposes the Commission prohibiting LECs from disconnecting local exchange service for non-payment of interstate long distance charges, should the FCC adopt such a policy, ICTC supports call control. However, the Commission should note that ICTC currently cannot block calls by interstate or intrastate jurisdiction given its switches' capability.

The FCC has also sought comment on voluntary toll restriction as a means to keep telephone penetration high¹. Although ICTC is willing to offer subscribers voluntary toll restriction without a service charge, the restricted service should not encompass the ability to make 800 calls since some

¹ Notice of Proposed Rulemaking ("NPRM") in CC Docket NO. 95-115 at Para. 17, p. 8.

No. of Copies rec'd
IN SCOPE

0410

calls are not free and would involve potential fraud or inability to pay for the calls which would lead to disconnection - the very result the blocking is designed to avoid. Again, ICTC's support of this concept would be in the form of an all jurisdiction blocking given its technical inability to block by jurisdiction.

The Commission has also proposed the adoption of pre-set dollar limitations, per-minute use limitations and time of day restrictions as a means to achieve greater connectivity to the public switched network.² ICTC favors these potential methods of achieving higher subscribership, however, they are not feasible for implementation today. In order to implement these caps on toll calling, ICTC's switches and billing system would require substantial modification. The running balance for each account would need to be kept on a real-time basis in order to cut off further use at the pre-agreed thresholds.

The FCC has additionally proposed that LECs adjust deposits required from low-income subscribers if they voluntarily undertake toll restriction.³ ICTC is willing to be flexible in collecting a deposit if the potential subscriber agrees to impose a toll restriction. By the same token if that restriction is removed, the customer's deposit should be increased to reflect an appropriate deposit for non-restricted toll service.

² NPRM in CC Docket No. 95-115 at para. 20, p. 9.

³ NPRM in CC Docket No. 95-115 at para. 26, p.11.

The most significant proposal in the Commission's docket seeks comments on a prohibition that would ban disconnection of local exchange service for failure to pay interstate long distance charges⁴. ICTC strongly disagrees with such a change in policy since it will have far-reaching financial consequences that may ultimately raise the price of service and drive customers off the network.

LECs must be able to disconnect local and toll services in toto. One reason ICTC takes this position stems from the billing system in current use. ICTC tracks a total due for all services - both local and toll - and does not track a balance "by entity." The financial impact ICTC anticipates if the FCC adopts this policy would flow from an expected loss of billing and collection revenue paid by carriers. A LEC's billing and collection product will be far less attractive to long distance carriers if the LEC cannot disconnect local service for nonpayment of that carrier's long distance charges. This will set off an upward spiral in the LEC's expenses as the cost of doing business increases, billing and collection revenues are lost and uncollectibles rise. ICTC expects that the net effect of passing on the higher costs to its subscribers will result in a reduction in overall connectivity to the network.

Finally, the Commission seeks input on various means that

⁴ NPRM in CC Docket No. 95-115 at para. 31, p. 13.

may increase phone service among highly mobile, low-income populations.⁵ ICTC supports the use of debit cards and voicemail boxes as viable alternatives for the low-income mobile populace and ICTC suggest that the FCC should therefore, promote the use of those alternatives by permitting lifeline funds to be applied, at the potential customer's election, on voicemail box or debit card purchases as an alternative to a reduction in the subscriber line charge.

CONCLUSION

For all the above-stated reasons, Illinois Consolidated Telephone Company opposes a change to its current capability to disconnect all services for nonpayment of toll charges. ICTC supports less costly and burdensome methods of achieving increased connectivity to the public switched network such as voluntary toll restriction and corresponding advance deposit reduction. ICTC further suggests the FCC allow customers to choose how to spend a set amount of lifeline funds, so that voicemail boxes and debit cards, which may be more useful than a reduced Subscriber Line Charge to low-income mobile persons, are Commission supported options.

⁵ NPRM at para. 38, p. 15-16.

Respectfully submitted,

A handwritten signature in cursive script, reading "Ellyn Elise Crutcher". The signature is written in dark ink and is positioned above the printed name.

Ellyn Elise Crutcher
Counsel for
Illinois Consolidated
Telephone Company

September 26, 1995

CERTIFICATE OF SERVICE

I, Ellyn Elise Crutcher, hereby certify that a copy of the Comments of Illinois Consolidated Telephone Company were delivered by first class, postage-prepaid mail to those persons listed below:


Ellyn Elise Crutcher

William Caton
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554
(plus 9 copies)

ITS
2100 M. Street, N.W.
Washington, D.C. 20037

Ernestine Creech
Accounting and Audits Division
2000 L. Street, N.W.,
Washington, D.C. 20554

f:\knsharp\wp51\95_115